

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

*Plaintiff,*

-against-

SEAN COMBS, JUSTIN DIOR COMBS, CUBA  
GOODING JR., LUCIAN CHARLES GRAINGE,  
KRISTINA KHORRAM, LOVE RECORDS, MOTOWN  
RECORDS, UNIVERSAL MUSIC GROUP, COMBS  
GLOBAL ENTERPRISES, JOHN and JANE DOES 1-10  
and ABC CORPORATIONS. 1-10,

*Defendants.*

Case No.: 24-cv-01457

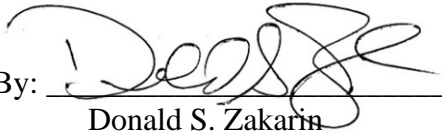
**NOTICE OF MOTION FOR  
SANCTIONS**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in support of this Notice of Motion, the Declaration of Donald S. Zakarin dated May 16, 2024, and the exhibits annexed thereto, and all prior proceedings heretofore had and all papers filed herein, Sir Lucian Grainge, Motown Records and UMG Recordings, Inc. (incorrectly named as Universal Music Group) (collectively “UMG”) will move this Court, at a date and time to be determined by the Court, for Orders, pursuant to 28 U.S.C. § 1927 and the inherent power of this Court, sanctioning plaintiff Rodney Jones (“Plaintiff”) and Plaintiff’s counsel, Tyrone Anthony Blackburn, Esq.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Civil Rule 6.1(b), any opposing affidavits and memoranda shall be served within fourteen days following the date that is 21 days after the service of this motion, and any reply papers shall be served within 7 days after service of the answering papers.

Dated: New York, New York  
May 17, 2024

**PRYOR CASHMAN LLP**

By:  \_\_\_\_\_  
Donald S. Zakarin

James A. Janowitz  
William L. Charron  
Nicholas Saady  
Alina Jamil Mian

7 Times Square  
New York, New York 10036  
(212) 421-4100  
dzakarin@pryorcashman.com

*Attorneys for the UMG Defendants*